

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TEXAS  
WACO DIVISION**

TRAXCELL TECHNOLOGIES, LLC	§	
	§	
Plaintiff,	§	
	§	
vs.	§	Civil Action No. 6:21-cv-01312-ADA
	§	
GOOGLE LLC,	§	
	§	
Defendant.	§	

**NOTICE REGARDING DEFENDANT’S  
MOTION TO TRANSFER VENUE TO THE  
NORTHERN DISTRICT OF CALIFORNIA PURSUANT TO § 1404(a)**

Defendant Google LLC (“Google”) filed a Motion to Transfer Venue to the Northern District of California on May 3, 2022. Dkt. No. 38. Under the Court’s Standing Order Governing Proceedings for Patent Cases (OGP) 4.1 (Dkt. No. 32) and Local Rule CV-7(D)(1), Plaintiff Traxcell Technologies, LLC (“Traxcell”) was required to file by May 17, 2022 a response to Google’s motion within 14 days after Google filed its motion on May 3, 2022 or “file a notice of venue or jurisdictional discovery if the discovery will delay a response to a motion to transfer.” Dkt. No. 32 at 5 (Section V). Traxcell did not file by May 17 either a response to Google’s motion or a notice that it was seeking venue or jurisdictional discovery.

Accordingly, for the reasons stated above and in its motion, Google respectfully requests that the Court consider Google’s Motion to Transfer unopposed, and grant Google’s requested relief. Local Rule CV-7(D)(2) (“If there is no response filed within the time period prescribed by this rule, the court may grant the motion as unopposed.”); *see also De La Vega v. Amazon (USA), Inc.*, 6-19-cv-00618 (W.D. Tex. Feb. 07, 2020) (“Because Mr. De La Vega has not filed

his response within the 7-day time period prescribed by Local Rule CV-7, the Court GRANTS this motion as unopposed.”); *Jefferson Street Holdings Intellectual Property LLC v. Tech21 Inc.*, 5-18-cv-00806, Dkt. No. 32 at 1 (W.D. Tex. Oct. 29, 2019) (“Although the deadline has passed, no response has been received by the Court. Accordingly, the Court considers the motion to be unopposed.”); *Yeti Coolers, LLC v. RTIC Coolers, LLC*, 1-15-cv-00597, Dkt. No. 110 at 3, 2016 WL 5956081, at \*2 (W.D. Tex. Aug. 01, 2016) (“For good cause shown, and as RTIC did not timely respond to YETI’s motion for redaction, the Court grants YETI’s motion as unopposed.”); *Kaden v. Smith*, 3-15-cv-00146, Dkt. No. 26 at 1 (W.D. Tex. Mar. 09, 2016) (“As of this date, Defendant has filed no response. Therefore, the Court will grant Plaintiff’s Motion as unopposed.”).

Dated: May 18, 2022

Respectfully Submitted,

/s/ G. Blake Thompson

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*ATTORNEYS FOR DEFENDANT  
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**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that the foregoing document was filed electronically in compliance with Local Rule CV-5(a). As such, this document was served on all counsel who have consented to electronic service on May 18, 2022.

/s/ G. Blake Thompson  
**G. Blake Thompson**